REMARKS

This Amendment is filed in response to the Office Action dated November 14, 2005, which has a shortened statutory period set to expire February 14, 2005.

Applicant Addresses Claim Objections

Applicant greatly appreciates the Examiner's close reading of the claims and the suggested amendments to certain claims. Applicant has amended Claims 1, 4, 10, 11, 12, and 15 to conform to the Examiner's suggestions. Therefore, Applicant requests reconsideration and withdrawal of the objection to Claims 1, 4, 10, 11, 12, and 15.

Claims 1, 3-4, 6-7, 10-12, 14-16, and 18-21 Are Patentable Over Tsukuda

Claims 1 and 12, as amended, recite in part:

the LUT generated using a resist model and organized based on feature size, pitch size, and feature/defect identification.

Claim 4, as amended, recites in part:

the LUT generated using a second model more accurate than the first model and organized based on feature size, pitch size, and feature/defect identification.

Claims 7 and 21, as amended, recite in part:

the LUT organized based on feature size, pitch size, and feature/defect identification.

Claim 15, as amended, recites in part:

storing the thresholds in the LUT organized based on feature size, pitch size, and feature/defect identification.

Applicant respectfully submits that Tsukuda fails to disclose or suggest these limitations. Specifically, Tsukuda teaches that resist model data DT9 (including resist effect and etching effect related to resolvability) can be used to change a threshold value (provided by threshold value to exposure energy data DT3) according to a magnitude of a pattern, thereby permitting a finish prediction coincident with the resist characteristics. Col. 14, lines 12-20 and FIG. 17. Moreover, Tsukuda teaches a line/space (L/S) matrix in, for example, FIG. 15. Data DT9/DT3 and the L/S matrix cannot be characterized as including an organization based on feature size and feature/defect identification. Because Tsukuda fails to disclose the recited limitations of Claims 1, 4, 7, 12, 15, and 21, Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 1, 4, 7, 12, 15, and 21.

Claim 3 depends from Claim 1, Claims 5-6 depend from Claim 4, Claims 10-11 depend from Claim 7, Claim 14 depends from Claim 12, and Claims 16 and 18-20 depend from Claim 15. Therefore, Claims 3, 5-6, 10-11, 14, 16, and 18-20 are patentable for at least the reasons presented for Claims 1, 4, 7, 12, and 15. Based on those reasons, Applicant requests reconsideration and withdrawal of the rejection of Claims 3, 5-6, 10-11, 14, 16, and 18-20.

Moreover, Claims 3 and 6 recite, "wherein obtaining threshold data can indicate an exact match or a closest match in the LUT". Similarly, Claim 14 recites, "wherein code for obtaining threshold data can provide at least one of an exact match in the LUT and a closest match in the LUT". Tsukuda fails to teach anything about a "closest" match in a LUT. Therefore, Applicant requests further reconsideration and withdrawal of the rejection of Claims 3, 6, and 14.

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Moreover, Claim 16 recites, "wherein thresholds vary for different patterns, pitch sizes, feature sizes, and defect types". Tsukuda fails to teach a threshold variance for different patterns, feature sizes, and defect types. Therefore, Applicant requests further reconsideration and withdrawal of the rejection of Claim 16.

CONCLUSION

Claims 1, 3-4, 6-7, 10-12, 14-16, and 18-21 are pending in the present application. Allowance of these claims is respectfully requested.

If there are any questions, please telephone the undersigned at 408-451-5907 to expedite prosecution of this case.
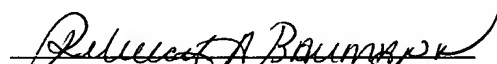
Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as FIRST CLASS MAIL in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on January 30, 2006.

Date: 1/30/2006

Signature: Rebecca A. Baumann

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